



October 18, 2023

VIA ELECTRONIC FILING

The Honorable Paul G. Gardephe
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square, Room 2204
New York, NY 10007

Re: Ralph Spencer v. Global Innovative Group, et al.; Case No. 17-cv-07604

Dear Judge Gardephe:

As you are aware, the undersigned Derek Smith Law Group, PLLC, represents the Plaintiff, Mr. Ralph Spencer, in the above-captioned matter. I write this letter, having conferred with Defendant's counsel, and having reviewed of the Court's Rule of Practice to respectfully request that Your Honor terminate the case management conference currently scheduled to take place before Your Honor on October 26, 2023, at 9:30 A.M.

As Your Honor may recall, Your Honor scheduled the case management conference via Order dated October 12, 2023 (Dkt. No. 40). However, below signed counsel for Plaintiff is previously scheduled to be on vacation between October 26, 2023, through October 29, 2023, and is subsequently preparing to move from Miami, Florida to Philadelphia, Pennsylvania on November 11, 2023. Despite best efforts to find coverage, as of this filing, there is no other available attorney that morning that can stand in.

As a result, Plaintiff respectfully request that Your Honor reschedule the herein conference for a later date. Having discussed this matter with Defense, the parties can be available November 30, or December 7, 14, 21.

Thank you for your consideration.

Respectfully submitted,

DEREK SMITH LAW GROUP, PLLC

MEMO ENDORSED: It is hereby ORDERED that the conference in this matter currently scheduled for October 26, 2023, is adjourned to **Thursday, November 2, 2023, at 10:45 a.m.**

SO ORDERED.

Paul G. Gardephe
United States District Judge
Dated: October 19, 2023

s/ Caroline H. Miller
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